

# Post-Award Administration

*An Overview for New Investigators*



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# Topics to Discuss:

- The Notice of Award (NoA)
- Annual Reporting
- Post Award Issues - Unobligated Balances, Problems with the Research
- Prior Approvals - Recipient Authorities, the Rules, the Requirements, Examples
- Closeout
- Resources
- Final Reminders & Things to Consider

# The NIH Grant Application Cycle

Investigator  
Initiates  
Research Idea



Inst. Submits  
Application  
to NIH

Center for Scientific Review

Assign to SS

Assign to Institute

Study Section: Scientific Review Officer

Review for Scientific Merit

Institute: Program Director

Programmatic Evaluation

Advisory Councils and Boards

2<sup>nd</sup> Level Review Recommendations

Institute Director

Approves Funding

Allocates Funds  
(NoA)

Grants Management  
Specialist

Conducts  
Research

# The Notice of Award (NoA)

*What is it?*

## The Notice of Award (NoA):

- Electronically available to recipient
- Legally binding document
- Identifies grant number, recipient organization, PD/PI
- Establishes period of approved support
- Sets forth terms and conditions
  - accept these by drawing down funds from the Payment Management System
- Includes awarding agency contact info – Grants and Program

## The NoA, continued:

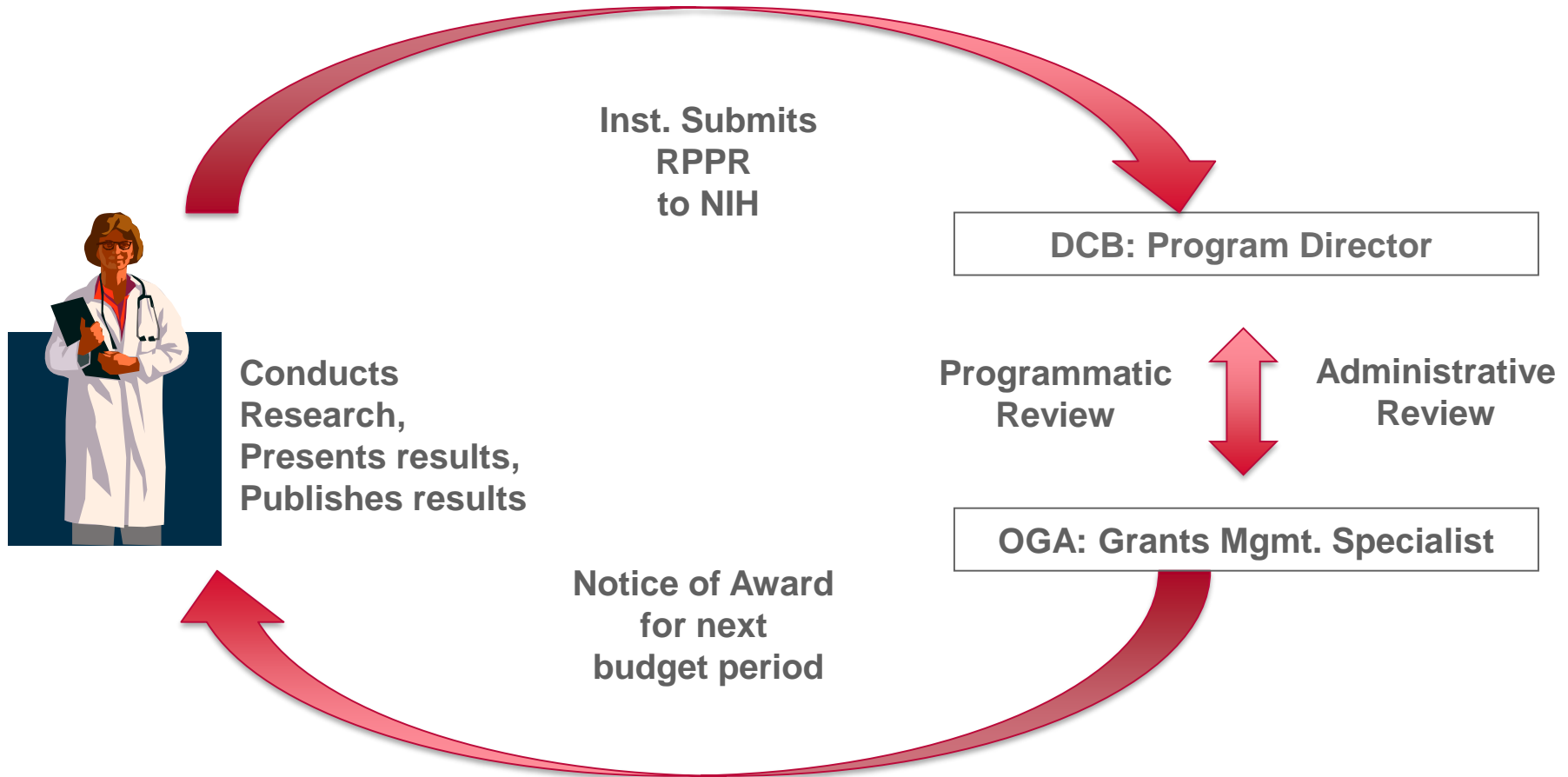
- Establishes funding levels
  - Initial year is obligated via the Notice of Award
  - Future year amounts are commitments & subject to change, pending FY funding policy
- Funds are made available via the Payment Management System
- All restricted funds must be tracked separately
- Recipients are responsible for connecting all expenses to the award

Your institution's Sponsored Projects staff will help you with this!

# Annual Reporting: Research Performance Progress Report (RPPR)

*What's Due When?*

# The NIH Research Performance Progress Report (RPPR) Cycle





# Annual Reporting:

- Annual reports are required to be submitted using the [Research Performance Progress Report \(RPPR\)](#) module in eRA Commons
  - Required for all awards
  - No updated IRB or IACUC approvals needed during RPPR submission
  - RPPR Questions: Change in Other Support? Change in effort for key personnel? Unobligated balance greater than 25%?
  - Ensure all programmatic requirements are accounted for (as appropriate)

## Annual Reporting, continued:

- Streamlined Non-Competing Award Progress (SNAP) RPPRs (ex. virtually all R-series grants)
  - Due no later than 45 days prior to the listed start date
- Non-SNAP RPPRs (ex. U01, P01, etc.)
  - Due no later than 60 days prior to listed start date
  - Requires detailed budget
  - Annual Federal Financial Report
- Multi-Year Funded (MYF) RPPRs (ex. DP2s)
  - Due on or before the anniversary of the budget/project start date
    - See terms and conditions of award for specific due date
  - Does not receive a Notice of Award each year

# Post-Award Issues

*What are they? What can be done?*

# Unobligated Balances:

- Does the award have “carryover authority”? (listed on NoA)
  - Generally, R series will have automatic carryover
  - Generally, U01s will not have automatic carryover
  - Carryover authority is not applicable to DP2s
- Bona Fide Need Rule
  - Can the awarding agency expect all available and next year’s funds to be spent in the listed time period?
- Provide an accurate estimate of the balance and assessment of the project
- Explain what may have occurred and what is planned

## Unobligated Balances, continued:

- Tips in working with NIH on situations regarding the balance:
  - Balances typical equate to slow progress – be forthcoming
  - Submit timely reports (FFRs) and information
  - Discuss options proactively – there are a lot of different options!

WE ARE NOT LOOKING TO TAKE THE \$ - we are looking to do what is in the best interest for all parties!

# Problems with the Research?

- Scientific and therefore budget delays do occur
  - Research is starting slower than expected
  - Issues with hiring personnel
  - Trouble with obtaining necessary approvals
  - Enrollment is lower than anticipated
- Engage with your Grants Management and Program staff sooner than later
  - Will greatly aid in future conversations and considerations

# Prior Approval

*Needed or Not?*

# Recipient Authorities:

- Standard terms and conditions of award give many authorities to the recipient (i.e. no need for prior approval). This includes (in general):
  - Carryover of unobligated balances – unless stated otherwise on the award
  - Cost-related changes/rebudgeting – unless change in scope
  - Extension of project period without additional funds (up to 12 months) – except DP2
  - Transfer of work to a 3<sup>rd</sup> party – unless change in scope or foreign entity
- Any authority listed in policy can be overridden by any special term on the award and/or specifics listed in the Funding Opportunity Announcement (FOA)



# The Rules:

- The following items do require prior approval, provided by OGA:
  - Additional of a foreign component
  - Pre-award costs more than 90 days of a competing award
  - Change in scope
  - Deviation from award terms and conditions
  - Change in the PI or other key personnel identified in the award
  - Change in recipient organization (i.e. transfer)
  - Extension for more than 12 months
  - Need of additional funding

# The Requirements:

- All requests for prior approval must be:
  - Submitted in writing/e-mail letter – included complete grant number, PD/PI name and recipient name
    - Some can be submitted electronically via Prior Approval Module
  - Must be submitted by the Authorized Organization Representative for the recipient
  - Submit the request approximately 30 days prior to change
  - Send the request to the grant's Grants Management Specialist and Program Official
  - Detail the specific need with appropriate justification (scientific and budget, as appropriate)

# Prior Approval

*Some Examples*

# Key Personnel:

- Change in the PI or key person's status
  - NIH definition of key person – PI or PIs (if multiple) and any person named on the award
  - Any change in effort greater 25% from approval level
  - Replacement or absence greater than three continuous months
  - All others do not need NIH's prior approval
  - Be sure to detail any scientific and budgetary impact in the request
  - Include biosketch and other support
  - If multi-PI, address the leadership plan

# Change of Recipient Organization:

- Award belongs to the recipient and must be relinquished
- Need to submit a change of recipient organization application
- Address any impact to the award because of the change
- Issues that are typically encountered:
  - Late notice of a PI leaving (ex. find out in the RPPR)
  - Late submission of the relinquishing and/or transfer application
  - An associated change in scope of the project
  - Multi-PI situation where the contact PI is moving
  - The proposed new recipient organization will not be substantially involved in the project

## Change in Scope:

- Recipient makes the initial determination on significance of change
- Consult with NIH as needed
- The following may indicate a change in scope:
  - Significant rebudgeting of more than 25% of total award
  - Change in use of animals or human subjects research
  - Significant change in key personnel
  - Shift in research emphasis
  - Application of new technology

# Closeout

*It's Serious Business!*

## Closeout:

- Process by which NIH determines that all applicable administrative actions and all required work of an award have been completed by the recipient and NIH.
- All applicable reports are due no later than 120 days after the project end date – See Project Period End Date on Notice of Award
  - Final Federal Financial Report
  - Final Research Performance Progress Report
  - Final Invention Statement and Certification
- Delinquent Reporting may result in Unilateral Closeout



# Available Resources

*A Very Small Sampling...*

# Resources:

- NIH Grants & Funding Page - <https://grants.nih.gov/grants/oer.htm>
  - Instructions & Forms Library
  - NIH Grants Policy Statement
  - NIH Guide for Grants & Contracts (FOAs, Policy Notices, etc.)
- NCI Grants and Training Page - <https://www.cancer.gov/grants-training>
  - Policies and Processes
  - Grant Funding Information (FOAs, Funding Strategy, etc.)
- Office of Laboratory Animal Welfare - <https://grants.nih.gov/grants/olaw/olaw.htm>
  - Policy Changes & Guide Notices
  - Reporting Noncompliance

## Resources, continued:

- Clinical Trial Requirements for Grants and Contracts - <https://grants.nih.gov/policy/clinical-trials.htm>
  - Policies & Changes
  - Clinicaltrials.gov Registration & Reporting
- Research Involving Human Subjects - <https://humansubjects.nih.gov/>
  - Regulations, Policies & Guidance
  - Human Subjects Protections Training
- Public Access Policy - <https://publicaccess.nih.gov/>
  - When & How to Comply
  - Managing Papers & Reporting to NIH

# Final Reminders & Things to Consider

*Please, Don't Forget!*

## Reminders & Things to Remember:

- Submit timely reports and applications – be sure to follow the instructions!
- Stay on top of the associated requirements (ex. Public Access and Financial Conflict of Interest)
- Make sure to know your organization's policies and procedures
- Have conversations at the appropriate time with Program about your continuation
- Prepare for closeout for any projects that are ending
  - Close-out is serious business – see [NIH guidance](#)



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